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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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| In the Matter of | ) | |
| | ) | |
| Overcoming Obstacles to Telephone Service for Indians on Reservations | ) ) | BO Docket No. 99-11 DA 99-201 |

## COMMENTS OF U S WEST COMMUNICATIONS, INC.

Melissa Newman
Suite 700
1020 19th Street, N.W.
Washington, DC 20036
(202) 429-3120

Of Counsel,
Dan L. Poole

March 31, 1999

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# COMMENTS OF U S WEST COMMUNICATIONS, INC.

## I. INTRODUCTION AND SUMMARY

On January 29, 1999, the FCC held hearings in Albuquerque, New Mexico to take testimony from concerned parties regarding the low levels of penetration of basic telephone service on Native American Reservations.[1] The FCC is seeking to understand the root causes associated with this problem, and steps that can be taken by industry and government at the federal, state and local levels to address these issues.

The Telecommunications Act of 1996 promises that all Americans in all regions of the Nation shall have affordable basic service and access to advanced services comparable to those in urban areas. To achieve this goal, actions by both industry and federal and state governments must be taken. U S WEST'S written comments offer guidance to the FCC on what actions the industry and government should take to ensure that Native Americans living on Reservations obtain basic services at affordable rates.

It is worth noting at the outset that, like most of the components of Universal Service, the issues surrounding the delivery of ubiquitous telecommunications services to Native American communities are many and complex. There is no single solution that will completely solve this problem. Rather, it is U S WEST'S belief that the answers lie in some combination of the following policy reforms:

- Revised Universal Service programs and explicit support mechanisms that will effectively target support to Native American communities.
- Better awareness and use in Native American communities of existing federal and state programs that support service development, such as the Lifeline and LinkUp programs.
- Cooperative efforts for negotiation of Rights of Way for the construction of facilities on Tribal lands.
- Awareness of products for the management of long-distance and other charges on customer's bills.
- Revision and/or elimination of regulations that impede investment in Native American communities for the delivery of basic and advanced services.

A number of witnesses from the Native American community presented constructive suggestions for addressing these issues. At the Albuquerque hearing, Karen Radney Buller, President of the National Indian Telecommunications Institute, offered several concrete suggestions regarding how telephone penetration on Native American Reservations can be increased. U S WEST'S comments focus, in part, on three of her suggestions. First, one barrier to serving these communities is the cost of construction. Ms Buller correctly noted that it can cost $10,000 to $60,000 for the initial POTS line into a Reservation home. She suggests that the Universal Service Fund should pay for these costs and proposes that when Tribal lands are involved, 100 % of the cost should come from the Federal Universal Service Fund.

[1] On March 23, 1999 a similar hearing to gather information regarding telecommunications services on Native American Reservations was held in Chandler, Arizona. Where appropriate, information presented in that hearing will also be discussed in these comments.

Second, Ms. Buller called attention to the FCC rule that defines a study area as an entire state and results in costs being determined by averaging within a study area. As Ms. Buller noted in her testimony, "[b]y averaging the underserved communities with the large urban areas, a false story is told." She suggests, and rightly so, that Tribal lands should be their own separate study area.

Third, Ms. Buller suggests that the FCC and the company making an application to provide phone service notify the tribes of any provision or change in the provision of service. She recommends that the FCC place a Native American notification on all application forms. U S WEST shares Ms. Buller's views that such a notification would, in addition to informing Tribal governments of any changes taking place on the Reservation, open a line of communication between the tribes and the telephone companies.

Fourth, Ms. Buller notes that "Affluent Americans continue to benefit from information and telecommunications, but Universal Service is not universal."
U S WEST agrees, and below discusses these issues in more detail and offers other concrete proposals to assist in the improvement of telephone penetration on Native American lands.

## II. U S WEST's NEW MEXICO SERVICE AREA

New Mexico provides service to all or a portion of 16 of the 22 Native American Reservations in the state. Table I, below, summarizes the extent of telephone service on these reservations.

**TABLE I**

| Name | % Penetration | USW |
|---|---|---|
| **Reservations With > 500 Households** | | |

| | | |
|---|---|---|
| Acoma | 71% | YES |
| Isleta | 82% | YES |
| Jicarilla | 49% | NO |
| Laguna | 74% | YES |
| Mescalero | 42% | NO |
| Navajo | 22% | NO |
| Picuri | 78% | YES |
| Pohoaque | 97% | YES |
| Sandia | 99% | YES |
| **Reservations With < 500 Households** | | |
| Alamo Navajo | 42% | NO |
| Canoncito | 47% | YES |
| Cochiti | 96% | YES |
| Jemez | 29% | NO |
| Nambe | 95% | YES |
| San Felipe | 86% | YES |
| San Idelfonso | 96% | YES |
| Santa Ana | 92% | YES |
| Santo Domingo | 77% | YES |
| Taos | 90% | YES |
| Teseque | 99% | YES |
| Zia | 84% | YES |
| Zuni | 67% | NO |

Source: Bureau of the Census

While some of the Reservations have penetration rates near or above the nationwide average penetration of 95%, clearly many of the reservations have penetration rates below these levels.

III. LIFELINE AND LINKUP PROGRAMS

It was apparent at the January 29, 1999 hearing that many members of the Native American community were not aware of the existence of the present Lifeline and Linkup programs. The FCC deserves credit for focusing the attention of all parties on the need to work in a collaborative fashion to increase awareness of these programs. Towards this end, representatives of U S WEST and the New Mexico Human Services Department recently met with residents of the Picuris Pueblo to sign up new customers for telephone service and to assist those who were eligible for Lifeline and Linkup benefits. U S WEST commits to continued communications with the leaders of other Tribal governments to provide information on these programs so that we may work together to connect Native Americans to the Information Age.

## IV. RIGHT-OF-WAY ISSUES

Historically, the negotiation of Right-of-Way (ROW) agreements for the construction of telecommunications facilities over Tribal lands has been a difficult and contentious issue, and has contributed to the low development of service on the Reservations. Multiple federal and state agencies, bureaucracy, and a lack of cultural understanding all have contributed to this climate in the past. In many cases tribes resisted requests to construct facilities on their land, and quoted exorbitant fees for ROW. Only several years ago, a New Mexico tribe took U S WEST to court for trespassing on their land to construct facilities.

Today offers the opportunity for new approaches to addressing the telecommunications needs of our Native American populations. The recent negotiation of landmark agreements for the construction of fiber optic backbones across the Laguna and Acoma Pueblos demonstrates that when the parties meet in good faith to address their mutual needs, then positive actions can result. These agreements truly represent a win-win situation for all parties. The carriers can expand their service base, and the communities can gain vital access to communications tools for social and economic development. The FCC's efforts to draw attention to the problems of the past, and to facilitate the collaborative efforts of governmental agencies, should also assist in meeting these needs.

## V. TOLL MANAGEMENT SERVICES

In her testimony, Karen Buller addressed the need for some means to address the impact that large long distance charges can have on customers' ability to afford basic telephone service. Studies have shown that many individuals who do not presently have telephone service at one time did have service, but large long distance bills (often incurred by people other than the service owner) resulted in the disconnection of service, and the inability to establish new service. U S WEST offers a toll blocking service in all 14 states that we serve, including New Mexico. As directed by the FCC in CC Docket No. 96-45, customers who qualify for Lifeline service can receive this toll blocking service at no charge. U S WEST is exploring ways to inform applicable Native Americans of this service.

## VI. TARGETING OF UNIVERSAL SERVICE SUPPORT

Under the existing Universal Service Fund, U S WEST received only $3.2M of high-cost support for all of its New Mexico customers in 1998. As discussed below, it is not possible to determine how much of this fund supports customers on Native American Reservations because qualification for support is based on the average cost of serving all U S WEST customers in the state of New Mexico. The amount, however, will fall far short of the minimum funding necessary to support affordable service in high-cost rural areas where many Native American Reservations are located.

Under the USF formulas, telephone companies whose Study Area average cost exceeds 115% of the nationwide average cost have a portion of their costs covered from the USF.[2] The primary reason that U S WEST receives so little support for its

[2] There are two formulas for qualification. Small companies with fewer than 200,000 lines in a Study Area receive a greater percentage of their costs in excess of 115% than companies (such as U S WEST) which

high-cost customers, such as Native Americans living on Reservations, is that when these customers' costs are averaged in with the cost of customers in low-cost metropolitan areas like Albuquerque and Santa Fe, the overall statewide average cost only slightly exceeds the 115% benchmark. The second reason for U S WEST's low draw from the USF is that public policies rely primarily on subsidies from urban customers to rural customers to support high-cost areas. Since the smaller companies lacked large urban areas to offset the cost of their high-cost customers, they needed more explicit support than larger companies.

One way to ensure that Native Americans receive basic telephone service is to target subsidies directly to them. This can be done by revising the rules on study areas and, as Ms. Buller, suggests, making Tribal lands their own study area to better target support where it is needed. Another factor would be to reexamine the 75/25 jurisdictional split, in which 75 % of universal service funding was to come from the state jurisdiction and 25 % was to come from the federal jurisdiction. As Ms. Buller suggests, when Tribal lands are involved, which are federal lands held in trust, 100 % of the funds should come from the federal jurisdiction. At the Chandler Arizona hearing on March 23, 1999, Governor Mary Thomas of the Gila River Community, and J. D. Williams, General Manager of the Cheyenne River Telephone Authority also expressed concern with the 75/25 funding plan. And, as Commissioner Ness observed at the NARUC Winter Meetings last November, this is not a federal versus state issue so much as it is a low-cost state versus high-cost state problem.

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serve over 200,000 lines. For costs between 115% and 150% of the national average smaller companies receive compensation for 65% of this difference, while large companies receive compensation for only 10%.

The Joint Board's decision to reexamine the 75/25 funding split is a step in the right direction in terms of making local exchange service affordable to Native Americans. We are concerned, however, that several other aspects of the Joint Board's recommended decision of November 23, 1998 move the funding issues in a direction which may be counter to the goals of affordable telecommunications service on Native American Reservations and in other remote high-cost areas. Two specific aspects of the Recommended Decision are problematic:

- The continued requirement for costs to be averaged at the Study Area level, and
- The conclusion that the new explicit support mechanism for non-rural LECs should be approximately at the same level as the present USF ($125M for the RBOCs and GTE).

As stated by RUS Deputy Administrator Chris McLean at the Arizona hearing on March 31, 1999, the problems faced in providing affordable telecommunications services on Native Americans Reservations are a microcosm of the problems faced in general for high-cost rural areas nationwide. As detailed in recent Universal Service Comments and Reply Comments, many stakeholders for rural America believe that the these recommendations represent a step backward in the effort to assure affordable service, and will be particularly harmful to the high-cost Native American communities.

As an initial matter, funding is based on the same Study Area averages of cost that have contributed to the problems that are being addressed in this proceeding. However, there is an important difference. Today's USF is based on Study Area *embedded* cost, while the proposal calls for Study Area *forward-looking economic cost.* Also, while the USF uses a benchmark of 115%, the Joint Board Recommendation suggests a range with 115% as the low-end alternative and 50% as the high-end alternative. Rather than talking in abstractions, however, the following charts illustrate this point. They show the problems faced by higher-cost western states with large concentrations of Native American communities in contrast with lower cost states.

**Chart 1**

**Relative Number of Low-Cost Customers**

| State | Customers |
|---|---|
| SD | 20 |
| MT | 24 |
| WY | 28 |
| NM | 53 |
| WA | 105 |
| FL | 755 |
| NY | 1,624 |
| MD | 3,701 |
| NJ | 30,825 |

Source: BCPM3 with FCC Common Inputs. Non-Rural LECs Only.

Chart 1 provides an illustration of the relative ratio of low-cost to high-cost customers. It shows how many customers in each of these states support each customer within that state that costs over $100/month to serve. As shown, in South Dakota, for each customer costing over $100 there are 20 customers over whom the cost of this support can be spread. In contrast, in New Jersey there are 30,000 customers available to share in allocation of costs. In New Mexico, there are 53 customers to support each $100 customer.

Chart 2 helps to quantify what these differences mean to individual customers. There is an important change, however, in the source data used to construct Chart 2. Chart 1 used the BCPM model developed by U S WEST, Sprint and BellSouth. Chart 2 uses data from the HAI 5.0 model developed by AT&T and MCI. In its recent Platform decision, the Commission concluded that the HAI model underestimates cost.

U S WEST agrees. The reason we have used HAI data is to show that, even if the lowest estimate of cost is used, one that the Commission has concluded in a record proceeding seriously understates cost, the same disparities exist.

**Chart 2**

## Relative Cost of Supporting Universal Service

| STATE | SURCHARGE |
|---|---|
| WY | $12.35/mo. |
| SD | $8.32/mo. |
| MT | $7.28/mo. |
| NM | $4.29/mo. |
| WA | $1.59/mo. |
| NY | $0.84/mo. |
| MD | $0.82/mo. |
| FL | $0.43/mo. |
| NJ | $0.09/mo. |

Source:HAI 5.0, Default Inputs, 18Kft loop. Non-Rural LECs Only. $30/month Benchmark.

Chart 2 uses the HAI 5.0 data to determine the total amount of surcharge that will be needed to support customers costing over $31/month (residential), and $51/month (business). That total amount of funding required is divided by the total number of lines to develop the per customer surcharge under the 75/25 plan. Again, while the per-customer cost in states with large numbers of Reservations such as Wyoming, South Dakota, Montana and New Mexico is many dollars per month, customers in New Jersey need only pay 9 cents per month to fund their universal service needs.

Chart 3

## Current USF Support Levels Will Be Insufficient

| STATE | HAI 5.0 FUNDS | PRESENT USF | SHORT | PER LINE |
|---|---|---|---|---|
| WY | $33.5M | $3.3M | $30.2M | $11.14/mo |
| SD | $22.4M | | $22.4M | $8.32/mo |
| MT | $29.3M | $1.3M | $28.0M | $6.97/mo |
| NM | $38.0M | $3.2M | $34.8M | $3.93/mo |

Source: HAI 5.0, Default Inputs, 18Kft loop. Non-Rural LECs Only. Data for non U S WEST states was not available at time this chart was prepared.

Chart 3 addresses the question of whether the current level of explicit funding is sufficient. This chart (for which we only had data from the U S WEST states) clearly shows that the present funding level is not sufficient. When the $3.2M that New Mexico currently receives is compared to the $38M total that the HAI model determines is necessary, there is a shortfall of almost $36 million.

Chart 4

## Impact of Joint Board Recommendation

| STATE | HAI SUPPORT | JOINT BOARD PLAN 115% | 150% |
|---|---|---|---|
| WY | $12.35 | $9.67 | $1.24 |
| SD | $8.32 | $3.50 | - |
| MT | $7.28 | $3.59 | - |
| NM | $4.29 | - | - |
| WA | $1.59 | - | - |
| NY | $0.84 | - | - |
| MD | $0.82 | - | - |
| FL | $0.43 | - | - |
| NJ | $0.09 | - | - |

Source: HAI 5.0, Default Inputs, 18Kft loop. Non-Rural LECs Only.

Finally, still using the HAI data, Chart 4 determines the amount of funding that each state would receive under the Joint Board's recommendation. Even at the low-end 115% benchmark, New Mexico's high-cost customers, including New Mexico's Native American Reservations, would receive no explicit high-cost funding. At the high-end 150% benchmark only Wyoming would receive funding, and then at only 10% of what HAI found necessary.

What this means is that under the Joint Board's plan, in the absence of sufficient funding, U S WEST will need to continue to rely on implicit sources of support for its high-cost customers and Reservations. This is a prescription for a two-tier information society.

In the absence of sufficient explicit funding, U S WEST must compete vigorously in its lower-cost urban areas to retain these customers so that the implicit support to rural customers, including those on Native American Reservations, can continue. (In the extreme, if U S WEST lost all of its urban customers there would be no one to support the high-cost customers.) To remain competitive,

U S WEST would need to direct most of its capital resources to the urban areas. This would be good for urban consumers since they would enjoy an abundance of advanced telecommunications services. But it would be bad news for the rural customer. Strapped to maintain the cost of current services, and unable to attract the capital needed for the investment in advanced services, the rural customer will fall farther and farther behind. This is exactly the opposite of the result Congress intended, and the goals that this proceeding is designed to advance.

In her testimony at the hearing, Ms. Karen Buller of the National Indian Telecommunications Institute directly addressed the issue of targeting. She stated that funding for Native American Reservations would be more adequate if the Study Area were defined as the Reservation. U S WEST agrees with Ms. Buller's observation. By targeting support to the Reservation, we avoid the perpetuation of unsustainable implicit support from urban areas, and assure predictable support sufficient to meet the needs of the Reservation. U S WEST would suggest that one additional step be taken to assure sufficiency of funding.

Virtually all rural communities, and most Native American Reservations, have concentrations of customers located close to the central office which are relatively inexpensive to serve, and who will not require explicit funding to assure affordable service. By defining a "no support" zone around the central office and redistributing the support to the remaining customers outside this zone, two distinct benefits will occur:

- Providers will not be artificially attracted only to the lower cost areas of the Reservation to realize a support windfall.

- The support provided to the outlying customers will be closer to the true cost of serving these customers, increasing the likelihood that providers would build facilities to serve them.

To achieve the goals of the 1996 Act, and to assure the availability of affordable services to customers on Reservations, the FCC should adopt policies that accomplish the following:

- Develop tools and proxy models that accurately estimate the cost that will actually be incurred to build infrastructure on Reservations and other high-cost areas using today's technology.
- Target support to the customers that need it. Averaging over large areas of geography, while producing a lower fund size, will assure that the funds will not be available to provide the services as promised.
- Develop a federal funding mechanism that fairly shares the burdens of the requirements of the 1996 Act fairly and equally across all states.

As an alternative solution, the FCC should consider the "Super-Benchmark" or Interstate High-Cost Affordability Plan (IHCAP) that U S WEST has proposed on the record in CC Docket No. 96-45. Under this plan, customer's in areas where the needed support exceeds a higher super-benchmark (in our comments we suggested $50/month) receive all funding needs over this amount from the federal fund. This recommendation would accomplish Ms. Buller's goal of having 100% of Reservations' high cost funding needs met by the federal fund. U S WEST looks forward to working with the FCC to develop sensible universal service plans that will assure that consumers living and working in all areas of our Nation, particularly those on Native American Reservations, can have access to an abundant array of telecommunications services.

Ms. Buller also spoke of the need for the Universal Service Fund to address the high initial construction costs. Historically, regulators and industry did not want to burden the general body of ratepayers with the extremely high cost of remote customers. For this reason construction charges, often in the tens of thousands of dollars, were assessed. The inability of many rural customers, and in particular many Native Americans, to afford these charges has contributed to the low penetration levels. U S WEST agrees with Ms. Buller's proposal that ,in certain circumstances, the Universal Service Fund contribute to these charges. Indeed, in our comments in CC Docket No. 96-45, U S WEST proposed a plan for the explicit mechanism to provide funding for construction in very high-cost areas. The Arizona Corporation Commission also proposed a similar plan. If facilities are to be constructed to high-cost areas of Native American Reservations, then it will be necessary for the fund to contribute some of this capital.

## VII. REVISION AND/OR ELIMINATION OF REGULATION

In his testimony at the January 29, 1999 hearing, U S WEST's Vice President for New Mexico, Edward Lopez, suggested that one way in which the provision of advanced services could be facilitated would be through the revision and/or elimination of outmoded rules and regulations. In this section we will provide additional information about the type of changes that Mr. Lopez was suggesting, and how changes such as these could play a significant role in bringing basic and advanced services to consumers on Reservations.

In times past, regulators and incumbent telephone companies had a social contract under which, in return for a protected local monopoly, LECs agreed to serve all customers within their certified territory. The 1996 Act finally and completely eliminated any pretext of monopoly protection, yet many of the rules and regulations under which we operate today are still premised on the existence of a monopoly. The Bell System divestiture in 1984, including its line of business restrictions, was also premised on a monopoly model. The 1996 Act provided a road map for the elimination of these restrictions once the RBOCs opened their markets to local competitors.

Since the passage of the Act, U S WEST has met its commitments to open its local markets It is notable, however, that about 95% of the competitive activity has occurred in Albuquerque and Santa Fe, and virtually all of this has been for business customers. None of this new competition has occurred on Native American Reservations.

U S WEST does not fault its competitors for their strategy. They are well funded and well managed companies. They are doing the economically correct thing in investing in markets where they can receive the greatest return on their investment. They are going after our urban business customers whose prices are high, and whose costs to serve are relatively low. To date, the CLECs pay very little towards the cost of preserving the affordable and ubiquitous service from which they as a business benefit– a situation that can and must change immediately. They are, however, having a significant impact on the universal service system, albeit a negative one. With each overpriced business line they win, they remove dollars from the system that flow to support high-cost rural customers. This is not in itself wrong, since the purpose of the new explicit support mechanisms is to replace (at least in part) this lost implicit support.

However, no universal service fund, regardless of its size, is going to completely solve the provision of affordable basic service to rural customers, and it will clearly not provide for the delivery of advanced services to these areas. The expansion of service in rural areas, and particularly the provision of advanced services, will require significant investments. Investment dollars in a competitive marketplace flow to where they will produce the greatest return. This fundamental law of economics applies to ILECs as well as CLECs. The CLECs have stated that they have no plans to invest in rural America. There is simply too much low-hanging fruit in the urban areas. For U S WEST, the company with perhaps the greatest ability and incentives to invest in rural areas, there are impediments to making the necessary investment. These include:

- The lack of a sufficient explicit universal service fund (see previous section).
- The inability to benefit from the revenues generated by all of the services provided by the investment (e.g., long distance services).
- The requirement to invest significantly more than should be necessary to serve rural customers (e.g., the interLATA restriction).
- The requirement to provide all investment to competitors at below-cost rates (e.g., Unbundled Network Elements)
- The requirement to offer all services, even in a competitive bidding environment, at tariffed rates.

Congress foresaw this problem, and in Section 706 of the 1996 Act provided the FCC with specific powers to forbear from any regulations that impede the delivery of advanced services to customers. U S WEST believes that it is now time for the FCC to forcefully wield these powers to provide incentives to incumbent carriers to serve high-cost rural areas, including Native American Reservations. It is our belief that eliminating unnecessary or outdated regulations need not have any negative impact on the development of local competition. U S WEST is committed to opening our local markets, and the FCC should maintain its oversight to assure that we do. Where competitors can serve customers more efficiently or better they should be allowed to do so. But their efficiencies should not come at the expense of unnecessary regulations or burdens on the incumbent.

As mentioned at the beginning of our comments, the issues surrounding the delivery of telecommunications services to Native American Reservations are many and complex, and it will take multiple actions by industry and governments to bring about the changes that all agree are necessary. The regulatory revisions suggested in this section will not, by themselves, fix the problems of Native American telephone penetration. However, they will help to create a business environment where change is more likely to happen. Actions that encourage telecommunications providers to invest in rural America will bring facilities and technology closer to the Reservation. The goals of the 1996 Act will be met when all Americans, and particularly those on Native American Reservations, are able to enjoy the benefits of the Information Age. U S WEST is committed to work with the FCC and with Tribal governments to make this vision a reality.

Respectfully submitted,

Melissa Newman

Melissa Newman
Suite 700
1020 19th Street, N.W.
Washington, DC 20036
(202) 429-3120

Of Counsel,
Dan L. Poole
March 31, 1999

## CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 31st day of March, 1999, I have caused a copy of the foregoing **COMMENTS** to be served, via hand delivery, upon the persons listed on the attached service list.

Kelseau Powe, Jr.

William E. Kennard
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Gloria Tristani
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Michael K. Powell
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Harold Furchtgott-Roth
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Susan P. Ness
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Lawrence E. Strickling
Federal Communications Commission
Room 5C540
Portals II
445 12th Street, S.W.
Washington, DC 20554

Mark Nadel
Federal Communications Commission
Room 5B551
Portals II
445 12th Street, S.W.
Washington, DC

Eric Jensen
Federal Communications Commission
Room 644
1919 M Street, N.W.
Washington, DC 20554

William A. Kohoe III
Federal Communications Commission
Room 5C312
Portals II
445 12th Street, S.W.
Washington, DC 20554

International Transcription
Services, Inc.
1231 20th Street, N.W.
Washington, DC 20036